

The civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

(a) PLAINTIFFS

DEFENDANTS

(b) County of Residence of First Listed Plaintiff _____
(EXCEPT IN U.S. PLAINTIFF CASES)

County of Residence of First Listed Defendant _____
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED.

(c) Attorney's (Firm Name, Address, and Telephone Number)

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff 3 Federal Question (U.S. Government Not a Party)
2 U.S. Government Defendant 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

	PTF	DEF	PTF	DEF	
Citizen of This State	1	1	Incorporated or Principal Place of Business In This State	4	4
Citizen of Another State	2	2	Incorporated and Principal Place of Business In Another State	5	5
Citizen or Subject of a Foreign Country	3	3	Foreign Nation	6	6

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
110 Insurance 120 Marine 130 Miller Act 140 Negotiable Instrument 150 Recovery of Overpayment & Enforcement of Judgment 151 Medicare Act 152 Recovery of Defaulted Student Loans (excl. vet.) 153 Recovery of Overpayment of Veteran's Benefits 160 Stockholders' Suits 190 Other Contract 195 Contract Product Liability 196 Franchise	PERSONAL INJURY 310 Airplane 315 Airplane Product Liability 320 Assault, Libel & Slander 330 Federal Employers' Liability 340 Marine 345 Marine Product Liability 350 Motor Vehicle 355 Motor Vehicle Product Liability 360 Other Personal Inj.	PERSONAL INJURY 362 Personal Injury— Med. Malpractice 365 Personal Injury— Product Liability 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY 370 Other Fraud 371 Truth in Lending 380 Other Personal Property Damage 385 Property Damage Product Liability	610 Agriculture 620 Other Food & Drug 625 Drug Related Seizure of Property 21 USC 881 630 Liquor Laws 640 R.R. & Truck 650 Airline Regs. 660 Occupational Safety/Health 690 Other	422 Appeal 28 USC 158 423 Withdrawal 28 USC 157 PROPERTY RIGHTS 820 Copyrights 830 Patent 840 Trademark	400 State Reapportionment 410 Antitrust 430 Banks and Banking 450 Commerce/ICC Rates/etc. 460 Deportation 470 Racketeer Influenced and Corrupt Organizations 480 Consumer Credit 490 Cable/Satellite TV 810 Selective Service 850 Security/Commodity/Exch. 875 Customer Challenge 12 USC 3410 891 Agricultural Acts 892 Economic Stabilization Act 893 Environmental Matters 894 Energy Allocation Act 895 Freedom of Information Act 900 Appeal of Fee Determination Under Equal Access to Justice 950 Constitutionality of State Statutes 890 Other Statutory Actions
REAL PROPERTY 210 Land Condemnation 220 Foreclosure 230 Rent Lease & Ejectment 240 Torts to Land 245 Tort Product Liability 290 All Other Real Property	CIVIL RIGHTS 441 Voting 442 Employment 443 Housing/ Accommodations 444 Welfare 445 ADA—Employment 446 ADA — Other 440 Other Civil Rights	PRISONER PETITIONS 510 Motions to Vacate Sentence Habeas Corpus: 530 General 535 Death Penalty 540 Mandamus & Other 550 Civil Rights 555 Prison Condition	710 Fair Labor Standards Act 720 Labor/Mgmt. Relations 730 Labor/Mgmt. Reporting & Disclosure Act 740 Railway Labor Act 790 Other Labor Litigation 791 Empl. Ret. Inc. Security Act	861 HIA (1395ff) 862 Black Lung (923) 863 DIWC/DIWW (405(g)) 864 SSID Title XVI 865 RSI (405(g)) FEDERAL TAX SUITS 870 Taxes (U.S. Plaintiff or Defendant) 871 IRS—Third Party 26 USC 7609	12 USC 3410 891 Agricultural Acts 892 Economic Stabilization Act 893 Environmental Matters 894 Energy Allocation Act 895 Freedom of Information Act 900 Appeal of Fee Determination Under Equal Access to Justice 950 Constitutionality of State Statutes 890 Other Statutory Actions

V. ORIGIN (PLACE AN "X" IN ONE BOX ONLY)

- 1 Original Proceeding 2 Removed from State Court 3 Remanded from Appellate Court 4 Reinstated or Reopened 5 Transferred from another district (specify) 6 Multidistrict Litigation 7 Appeal to District Judge from Magistrate Judgment

VI. CAUSE OF ACTION (Enter U.S. Civil Statute under which you are filing and write a brief statement of cause.)

VII. PREVIOUS BANKRUPTCY MATTERS (For nature of suit 422 and 423, enter the case number and judge for any associated bankruptcy matter previously adjudicated by a judge of this Court. Use a separate attachment if necessary)

VIII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION
UNDER F.R.C.P. 23

DEMAND \$

CHECK YES only if demanded in complaint:
JURY DEMAND: Yes No

IX. This case

is not a refiling of a previously dismissed action.

is a refiling of case number _____, previously dismissed by Judge _____

DATE

SIGNATURE OF ATTORNEY OF RECORD

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JEFFREY T. MILLER,)
on behalf of plaintiff and a class,)
Plaintiff,)
vs.) No. 1:14-cv-3097
FIRST ADVANTAGE BACKGROUND)
SERVICES CORP., TENANT)
VERIFICATION SERVICE, INC.,)
Defendants.) The Honorable Judge Shah

AMENDED COMPLAINT – CLASS ACTION

INTRODUCTION

1. Plaintiff, Jeffrey T. Miller, brings this action under the Fair Credit Reporting Act, 15 U.S.C. §1681 et seq. (“FCRA”), to secure redress for the failure of defendants First Advantage Background Services Corp. (“First Advantage”) and Tenant Verification Servcie, Inc. (“TVS”) to follow reasonable procedures to ensure the maximum possible accuracy of the background checks it provided prospective landlords regarding plaintiff.

JURISDICTION AND VENUE

2. The Court has jurisdiction under 28 U.S.C. §§1331 and 1337 and 15 U.S.C. §1681p.

3. Venue and personal jurisdiction are proper in this Court, in that plaintiff was injured in this District, defendants regularly do or transacts business in the District, and defendants regularly furnish consumer reports on persons residing within the District.

PARTIES

4. Plaintiff Jeffrey T. Miller is a resident of Chicago, Illinois.

5. Defendant First Advantage Background Services Corp. (“First Advantage”) is a corporation with its principal place of business at 1 Concourse Parkway NE, Suite 200, Atlanta, GA 30328. It does business in Illinois and has offices at 480 Quadrangle Drive, Suite A,

Bolingbrook, IL 60440. Its registered agent and office is Illinois Corporation Service Co., 801 Adlai Stevenson Dr., Springfield, IL 62703.

6. Defendant Tenant Screening Service, Inc. (“TVS”) is a corporation with its principal place of business in Blaine, Washington. Its registered agent is the Law Office of Gene R. Moses, PS, 2200 Rimland St., Suite 115, Bellingham, WA 98226.

7. First Advantage and TVS are engaged in the business, for profit, of providing reports concerning individuals’ credit and mode of living.

8. At all times relevant hereto First Advantage and TVS were “consumer reporting agencies” governed by the FCRA.

9. At all times relevant hereto First Advantage and TVS were regularly engaged in the business of assembling, evaluating and disseminating information concerning consumers for the purpose of furnishing consumer reports to third parties.

10. First Advantage describes its business as follows on its web site:

Keeping screening easy

Finding and retaining the right people every day can be made a little easier with First Advantage. Our winning combination of searches and services provide the insights to reduce your risk while dramatically improving the quality of your talent and the reliability of your renters. For these reasons, First Advantage has become a trusted partner to over 41,000 organizations worldwide – we deliver the results you need to propel faster, more informed decisions.

We’re where you need answers

As one of the largest screening providers in the world, First Advantage has offices in 26 locations worldwide, and we’re well known for our expertise in global data usage.

With a team of experts working on your behalf

Our team of experts understands the requirements of your local market and culture, with a unique global technology platform that is useful across all of your locations and scalable for your needs to bring you answers faster. Many of our employees have worked in the screening industry for over 25 years and have held leading positions with the National Association of Strategic Background Screeners and the Drug and Alcohol Testing Industry Association.

Offering the only advanced single-sign-on, multilingual solution

We have the only single, automated, scalable, and configurable screening platform that

works across all of our programs, no matter where you are in the world. This state-of-the-art product carefully packages your data in a way that is legally compliant for your location, highlighting what you need to know to take action. . . .
(<http://www.fadv.com/Our-Company/About-FADV.aspx>)

11. TVS describes itself as follows on its website:

TVS is a Credit Reporting Agency that serves the needs of the Residential Rental Industry by providing fraud prevention tools which target delinquent tenants. Specific areas of investigation include credit report tenants (Canada and USA), and criminal record search tenants and *eviction search tenants (USA only). The primary goal of TVS Tenant Verification Service is to assist landlords in identifying and thereby eliminating delinquent tenants as potential renters. Credit worthiness and Tenant worthiness are two criteria for landlords to determine for prospective renters.
(<https://www.tenantverification.com/about-tvs/>)

FACTS

12. On or about February 11, 2014, TVS and/or First Advantage issued an “Eviction Report” purportedly pertaining to plaintiff. A copy of the report is attached as Exhibit A.

13. The report had been requested by a prospective landlord, after plaintiff had sought to rent an apartment.

14. The report represented that plaintiff had been the defendant in an eviction case in the Circuit Court of Cook County, 13 M1 710898.

15. The report did not indicate that there was any question but that the eviction case involved plaintiff.

16. In fact, the lawsuit had been against a different person, Jeff Miller.

17. In the lawsuit, a Susan Cruz had sought to evict Jeff Miller and Lisa Piper from an apartment at 4053 N. Richmond, Chicago, Illinois.

18. Plaintiff had never lived at the address on Richmond that 13 M1 710898 was concerned with.

19. Plaintiff had never leased an apartment from Susan Cruz.

20. Plaintiff had no connection with the Lisa Piper referred to in the complaint.

21. On information and belief, defendants issued Exhibit A, without any qualification, based on the fact that plaintiff and the Jeff Miller involved in 13 M1 710898 had similar names.

22. This is not a reasonable basis for assuming that the Jeff Miller who was the subject of the eviction case was the same person as the plaintiff.

23. A reasonable inquiry would have revealed that plaintiff was not the same person as the Jeff Miller who was the subject of the eviction case.

24. Defendant First Advantage represents to persons ordering its reports:
Identity Analytics

We use a complex algorithm that matches historical information to the data provided to confirm that the results you receive are for the right individual. This saves time and trouble, and ensures you're making your decisions based on the right data.

(<http://www.fadv.com/why-first-advantage/technology.aspx>)

25. In fact, First Advantage's procedures do not "ensure" that the user is "making your decisions based on the right data."

26. As a result of the issuance of the report, plaintiff had great difficulty finding housing and suffered aggravation and distress.

27. On or about March 4, 2014, plaintiff sent First Advantage the letter attached as Exhibit B, enclosing a letter from the attorney for the defendants in 13 M1 710898, pointing out that plaintiff was not the defendant therein.

28. First Advantage then removed the eviction from its report.

CLASS ALLEGATIONS

29. Plaintiff brings this action on behalf of a class, pursuant to Fed.R.Civ.P. 23(a) and 23(b)(3).

30. The class consists of (a) all individuals (b) on whose consumer report defendants reported a lawsuit (c) to which the individual was not a party (c) which report was prepared on or after a date 2 years prior to the filing of this action.

31. The class is so numerous that joinder of all members is not practicable. On information and belief, there are at least 40 members of the class.

32. There are questions of law and fact common to the class, which common

questions predominate over any questions relating to individual class members. The predominant common questions are:

- a. What are defendants' practices with respect to identification of the subject of a consumer report as a party to a lawsuit;
- b. Whether the criteria for matching the subject of a consumer report as a party to a lawsuit are consistent with the requirement of maximum possible accuracy.
- c. Whether such treatment violates the FCRA.

33. Plaintiff's claim is typical of the claims of the class members. All are based on the same factual and legal theories.

34. Plaintiff will fairly and adequately represent the class members. Plaintiff has retained counsel experienced in class actions and FDCPA litigation.

35. A class action is superior for the fair and efficient adjudication of this matter, in that:

- a. Individual actions are not economically feasible.
- b. Members of the class are likely to be unaware of their rights;

COUNT I – FCRA

36. Plaintiff incorporates paragraphs 1-35.

37. Defendants failed to comply with their obligations under the FCRA, 15 U.S.C. §1681e(b), by failing to follow reasonable procedures to assure the maximum possible accuracy of the information in the file they maintain on and their reports regarding plaintiff and others.

38. Section 1681e(b) provides:

(b) Accuracy of report. Whenever a consumer reporting agency prepares a consumer report it shall follow reasonable procedures to assure maximum possible accuracy of the information concerning the individual about whom the report relates.

39. Section 1681n provides:

§1681n. Civil liability for willful noncompliance

(a) In general. Any person who willfully fails to comply with any requirement imposed under this title with respect to any consumer is liable to that consumer in an amount equal to the sum of—

(1)(A) any actual damages sustained by the consumer as a result of the failure or damages of not less than \$ 100 and not more than \$ 1,000; or

(2) such amount of punitive damages as the court may allow; and

(3) in the case of any successful action to enforce any liability under this section, the costs of the action together with reasonable attorney's fees as determined by the court. . . .

40. Section 1681o provides:

§1681o. Civil liability for negligent noncompliance

(a) In general. Any person who is negligent in failing to comply with any requirement imposed under this title with respect to any consumer is liable to that consumer in an amount equal to the sum of--

(1) any actual damages sustained by the consumer as a result of the failure;

(2) in the case of any successful action to enforce any liability under this section, the costs of the action together with reasonable attorney's fees as determined by the court.

41. Section 1681p provides:

§1681p. Jurisdiction of courts; limitation of actions

An action to enforce any liability created under this title may be brought in any appropriate United States district court, without regard to the amount in controversy, or in any other court of competent jurisdiction, not later than the earlier of—

(1) 2 years after the date of discovery by the plaintiff of the violation that is liability; or

(2) 5 years after the date on which the violation that is the basis for such liability occurs.

WHEREFORE, plaintiff requests that the Court enter judgment in favor of plaintiff and the class and against defendants for:

a. Statutory damages;

- b. Actual damages;
- c. Punitive damages;
- d. Attorney's fees, litigation expenses and costs of suit;
- e. Such other or further relief as the Court deems proper.

s/Daniel A. Edelman
Daniel A. Edelman

Daniel A. Edelman
Tara L. Goodwin
EDELMAN, COMBS, LATTURNER
& GOODWIN, LLC
120 S. LaSalle Street, 18th Floor
Chicago, Illinois 60603
(312) 739-4200
(312) 419-0379 (FAX)

JURY DEMAND

Plaintiff demands trial by jury.

s/Daniel A. Edelman
Daniel A. Edelman

NOTICE OF LIEN AND ASSIGNMENT

Please be advised that we claim a lien upon any recovery herein for 1/3 or such amount as a court awards. All rights relating to attorney's fees have been assigned to counsel.

s/Daniel A. Edelman
Daniel A. Edelman

Daniel A. Edelman
EDELMAN, COMBS, LATTURNER
& GOODWIN, LLC
120 S. LaSalle Street, 18th Floor
Chicago, Illinois 60603
(312) 739-4200
(312) 419-0379 (FAX)

DOCUMENT PRESERVATION DEMAND

Plaintiff hereby demands that defendants take affirmative steps to preserve all recordings, data, documents, and all other tangible things that relate to plaintiff, the events described herein, any third party associated with any telephone call, campaign, account, sale or file associated with plaintiff, and any account or number or symbol relating to them. These materials are likely very relevant to the litigation of this claim. If defendants are aware of any third party that has possession, custody, or control of any such materials, plaintiff demands that defendants request that such third party also take steps to preserve the materials. This demand shall not narrow the scope of any independent document preservation duties of the defendants.

s/Daniel A. Edelman
Daniel A. Edelman

T:\29558\Pleading\[NUMBER] Amended Complaint_Pleading.WPD

CERTIFICATE OF SERVICE

I, Daniel A. Edelman, hereby certify that on July 30th, 2014, I caused to be filed the forgoing documents with the Clerk of the Court using the CM/ECF System, and caused to be served, on this date or as soon thereafter as service may be effectuated, a true and accurate copy of such filing via hand delivery or process server upon the following parties:

First Advantage Background Services Corporation
c/o registered agent Illinois Corporation Service Co.
801 Adlai Stevenson Dr.
Springfield, IL 62703

s/ Daniel A. Edelman
Daniel A. Edelman

Daniel A. Edelman
Tara L. Goodwin
EDELMAN, COMBS, LATTURNER & GOODWIN, LLC
120 S. LaSalle Street, 18th Floor
Chicago, Illinois 60603
(312) 739-4200
(312) 419-0379 (FAX)
courtecl@edcombs.com

EXHIBIT A

Eviction Report

Statewide Eviction Records Search

Input Provided

Name Jeffrey Thomas Miller
 DOB. [REDACTED]
 SSN [REDACTED]
 Address [REDACTED]

First Advantage

TVS#656472 Feb-11-2014

Court: COOK LAW MAGISTRATE - CHICAGO (COOK, IL). Plaintiff: CRUZ SUSAN

Name	Address	Additional Information on File:
JEFF MILLER	N RICHMOND ST CHICAGO IL	Amount: 3300 Date filed: May-14-2013 Jurisdiction: IL ILLINOIS Filing Number: 13M1710898 Filing Type: CIVIL NEW FILING

End of Report

Important: This report is provided pursuant to your Service Application and Agreement and must only be used in strict compliance with the terms thereof. As such, this report and the information contained herein must be held in strict confidence and must be used solely for tenant screening purposes. If you intend to take an adverse action based either in whole or in part on the contents of this report, you must comply with the requirements of the Fair Credit Reporting Act (FCRA) governing the use of consumer reports and the taking of adverse actions, including but not limited to providing the applicant with a copy of this report and the Federal Trade Commission's publication, A Summary of Your Rights Under the Fair Credit Reporting Act. TVS has previously provided your company with copies of this publication, and you can obtain additional copies by clicking the hyperlink above.

For compliance inquiries, contact the First Advantage Consumer Center Toll Free: (in the USA) at (800) 845-6004 or +1-678-694-2530 (outside of the USA).

The following document is a Case Information Summary File regarding

Case Number 2013-M1-710898

EXHIBIT B

Attention:

**First Advantage
Consumer Relations
P.O. Box 50465
Indianapolis, IN 46250-0465
Fax: (800) 868-6247**



First Advantage

A Sympathy Technology Group Company

Notice of Consumer Dispute (Form 122.96.7)

Please read the instructions prior to beginning:

Section A - Your Information

Full Name: MILLER T
 Last First M.I.

Address: Apartment/Unit #
 Street Address: CHICAGO IL 60605
 City State ZIP Code

Home Phone: () Alternate Phone: [REDACTED]

Social Security Number: Date of Birth: mm / dd / yyyy

Photo ID attached (e.g. copy of valid Driver's License) as proof of my identity.

Section B - Where/With Whom You Applied

Company Name: RESIDENTIAL APPLICATION TO LEASE IL 60605
 City State

Section C - Dispute Information

Please indicate the screening elements that contain information you wish to dispute the accuracy and/or completeness of that appears in your consumer report:

- Criminal Record Employment Record Credit Record
 Driving Record Education Verification Other **EViction Record**

Case Number: 13 MI 710898 Case Number: [REDACTED]

Case Number: [REDACTED] Case Number: [REDACTED]

Please provide a description of the information that you are disputing referencing case numbers as necessary:

THE DEFENDANT IN THIS CASE IS ANOTHER JEFF MILLER,
WHO HAS A DIFFERENT DATE OF BIRTH THEN MYSELF,
ALSO, I HAVE NEVER LIVED AT 4053 N. RICHMOND,
CHICAGO, IL. FOR VERIFICATION, YOU CAN CONTACT
MARK SWARTZ WITH LAWYERS COMMITTEE FOR BETTER
Housing AT 312 347 7600

Check box if you have attached a separate sheet to continue the explanation.





**Lawyers' Committee
for Better Housing**

February 18, 2014

Dear Sir or Madam:

RE: JEFFERY THOMAS MILLER, 900 S. CLARK ST., CHICAGO, IL

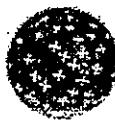
I am the legal director of Lawyers' Committee for Better Housing (LCBH). It is a matter of public record that LCBH represented one Jeff Miller as a defendant in a forcible entry detainer (eviction) action filed in the Circuit Court of Cook County as Case Number 2013-M1-710898. It is also a matter of public record that the property that was the subject matter of the eviction action was 4053 N. Richmond, Chicago, IL.

I was contacted last week by the attorney for one Jeffery Thomas Miller. It seems that certain credit reporting agencies have wrongly linked the public record of my client's eviction with Mr. Jeffery Thomas Miller's credit record. Please be advised that I have reviewed Mr. Jeffrey Thomas Miller's Illinois ID Card. Mr. Jeffery Thomas Miller, residing at [REDACTED] Chicago, IL is not my client Jeff Miller. He in no way resembles my client Jeff Miller, he does not share the same birthday as my client, and he was not a party in Case Number 2013-M1-710898.

Please do not hesitate to contact me should you have any questions.

Sincerely

Mark Swartz



First Advantage

A SumTotal Technology Group Company

Notice of Consumer Dispute (Form 122.96.7)

Section D – Acknowledgement

By signing below I, JEFFREY MILVER, am requesting a

First Name

Last Name

Reinvestigation of my consumer report that was prepared in respect to my application for employment. Furthermore, by signing below, I authorize you to notify the company that requested my report of my dispute and to provide them with the reinvestigation results.

Check this box ONLY if you do NOT want the company that requested the information to be notified.

Furthermore, I authorize you to provide updated reports to other employers who may have received a report within the past two years that includes the disputed information. I understand that I may contact the consumer relations department at the toll-free number to advise them of the companies I would like to provide updated results to.

I have reviewed the information I provided in this form and I affirm that to the best of my knowledge the information is true and accurate. The results of my reinvestigation will be mailed to the address I provided in "Section A – Your Information".

Signature: 

Date: 3/4/2014



First Advantage

A Symphony Technology Group Company

**Authorization for Reinvestigation
of Consumer Dispute
(Form 122.96.13)**

You have requested that First Advantage reinvestigate the consumer report that was conducted on you. By signing below, you hereby authorize without reservation, any party or agency contacted by First Advantage, to furnish any information needed to complete the reinvestigation of your consumer dispute. Further, you understand this release will permit any present or former employer, school, police department, criminal record depository, financial institution, division of motor vehicles, consumer reporting agencies, or other persons or agencies having knowledge about you to furnish First Advantage with any and all background information in their possession regarding you, that is required to complete the reinvestigation of your consumer dispute.

You also agree that a fax or photocopy of this authorization with your signature be accepted with the same authority as the original.

First Name: JEFFREY

Last Name: MILLER

Social Security Number: [REDACTED]

Date of Birth (mm/dd/yyyy): [REDACTED]

Signature: [REDACTED]

Date: [REDACTED]

Fax Call Report

HP Color LaserJet CM4730 MFP Series
Page 1

Fax Header Information

General Services Administra
13123539832
2014-Mar-04 03:56 PM

Job	Date/Time	Type	Identification	Duration	Pgs	Result
1111	2014-Mar-04 03:53 PM	Send	918008586247	1:59	6	Success

Attention:

First Advantage
Consumer Relations
P.O. Box 50465
Indianapolis, IN 46250-0465
Fax: (800) 868-6247

*FAX
REPORT*

CHECK LIST



First Advantage

A Symphony Technology Group Company

Request for Reinvestigation Instructions

Overview: In order to process the dispute of your employment background check report you must complete form 122.96.7 -- Notice of Consumer Dispute and provide authorization for reinvestigation by signing form 122.96.13 -- Authorization for Reinvestigation of Consumer Dispute. In order to reduce any possible delays, please print legibly with black or blue ink.

We have enclosed a copy of "A Summary of Your Rights Under the Fair Credit Reporting Act". If you are a California resident, we have also included a copy of "A Summary of Your Rights Under California Law". If you have any questions concerning this matter, please contact the Consumer Relations Department at (800) 321-4473.

1) Complete form 122.96.7 -- Notice of Consumer Dispute.

a. Complete Section A -- Your Information.

The results of our reinvestigation will be mailed to the address you provide. All of the information requested must be provided. When attaching a photocopy of your government-issued photo identification document, if possible, we ask that you enlarge the copy of your photo identification document as it enhances its legibility.

b. Complete Section B -- Where / With Whom You Applied.

Identify the employer who requested the background check report on you.

c. Complete Section C -- Dispute Information.

- i. In this section, please identify the area(s) of your employment background check report that you believe to be inaccurate or incomplete.
- ii. Identifying the case number(s) from the employment background check report may reduce the amount of time necessary to resolve your dispute.
- iii. Provide a specific description of the information that you are disputing. If you need more space to provide your description, please continue on a separate sheet and check the check box indicating that you are continuing your explanation.
- iv. In some instances it may be beneficial to submit supporting documentation (i.e. court documents, etc.) along with your reinvestigation request.

d. Complete Section D - Acknowledgement

After reviewing the information you have provided, sign and date the form.

2) Complete form 122.96.13 -- Authorization for Reinvestigation of Consumer Dispute.

3) Mail or fax the completed and signed forms along with a government issued photo ID and any other necessary supporting documentation to:

First Advantage
Consumer Relations
P.O. Box 50465
Indianapolis IN 46250-0465
Fax: (800) 868-6247